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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

In re:

TEMBLOR PETROLEUM
COMPANY, LLC,

Debtor-in-Possession.

Case No. 20-11367-A-11
Chapter 11
DC No. LKW-18

Date: April 28, 2021
Time: 9:30 a.m.
Place: Bankruptcy Court – Department A
United States Courthouse
2500 Tulare Street, Fifth Floor
Courtroom 11
Fresno, CA
Judge: Honorable Jennifer E. Niemann

**DECLARATION OF PHILIP F. BELL IN SUPPORT OF MOTION FOR ORDER
CONVERTING CHAPTER 11 CASE TO CHAPTER 7 FILED BY DEBTOR**

I, PHILIP F. BELL, declare:

1. I am the Managing Member of Temblor Petroleum Company, LLC (“Debtor”). Debtor is a limited liability company organized and existing under the laws of the State of California. Debtor owns and operates a petroleum and oil production business and Debtor conducts its business in California.
2. Debtor filed a Voluntary Petition under Chapter 11 of the Bankruptcy Code on April 9, 2020. Debtor is an oil and gas production company and Debtor is conducting its business as a “debtor-in-possession”. A Trustee has not been sought or appointed to serve in Debtor’s case and Debtor.
3. Debtor filed a First Amended Disclosure Statement and First Amended Plan of Liquidation on February 3, 2021 and a hearing on approval of the First Amended Disclosure

1 Statement was held on February 24, 2021. The Court did not approve Debtor's First Amended
2 Disclosure Statement and, instead, the Court has ordered Debtor to file a Second Amended
3 Disclosure Statement and Second Amended Plan of Liquidation by April 17, 2021.

4 4. Debtor has determined after consulting with its attorneys that it will be difficult
5 for Debtor to confirm a Plan of Reorganization or Plan of Liquidation in its Chapter 11 case
6 and, for that reason, it is in the best interest of all parties concerned for the Court to convert
7 Debtor's Chapter 11 case to a case under Chapter 7 of the Bankruptcy Code.
8

9 5. The foregoing statements are within my personal knowledge and I can testify
10 competently thereof if called as a witness.

11 I declare under penalty of perjury that the foregoing is true and correct.
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13 Dated: March 26, 2021

14 By: 
15 Philip F. Bell
16 PHILIP F. BELL
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